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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

JACQUELINE L. GENTLE  
DENISE A. WILLIAMS, and  
CAROLYN WILLIS-CASEY,  
Defendants.

CASE NO: 2:12-cr-463-JCM-VCF

**STIPULATION TO CONTINUE  
SENTENCING HEARING**

(1<sup>st</sup> Request)

IT IS HEREBY STIPULATED AND AGREED, by and between J. GREGORY DAMM, Assistant United States Attorneys; JAMES ORONOZ, ESQ., counsel for CAROLYN WILLIS-CASEY; KATHLEEN BLISS, ESQ., counsel for JACQUELINE GENTLE; and BRIAN SMITH, ESQ., counsel for DENISE WILLIAMS; that the sentencing hearing currently scheduled for April 18, 2016, at the hours of 10:30 a.m., 11:00 a.m., and 11:30 a.m., be continued to a time convenient to the Court, but no more than forty-five (45) days.

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This stipulation is entered into for the following reasons:

1. The additional time requested by this Stipulation to Continue Sentencing Hearing is reasonable pursuant to Fed.R.Crim.P. Rule 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed [for sentencing] in this rule.”
2. The parties are requesting additional time to address and potentially resolve their respective objections to their client’s respective presentence investigation reports.
3. Once the PSR Objections have been submitted to parole and probation, the respective PSR authors will need additional time to revise their reports and disclose them to the Court in advance of sentencing.
4. Defense counsel also require additional time to gather information pertinent to sentencing factors under 18 U.S.C. § 3553(a) in order to determine whether a variance may be warranted for their respective clients.
5. Defense counsel for JACQUELINE GENTLE has spoken to her client, who is currently in custody, and she has no objection to the continuance.
6. Defense counsel for DENISE WILLIAMS has spoken to his client, who is not currently in custody, and she has no objection to the continuance.
7. Defense counsel for CAROLYN WILLIS-CASEY has spoken to his client, who is currently in custody, and she has no objection to the continuance.
8. The additional time requested herein is not sought for purposes of delay.
9. Denial of this request for a continuance would deny counsel for the defendants sufficient time, to effectively and thoroughly prepare for sentencing. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

This is the first stipulation to continue filed herein.

DATED: March 31, 2016

/s/ James Oronoz  
 JAMES A. ORONOZ, ESQ.  
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/s/ Gregory Damm  
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*Counsel for Denise Williams*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

JACQUELINE L. GENTLE  
DENISE A. WILLIAMS, and  
CAROLYN WILLIS-CASEY,  
Defendants.

CASE NO: 2:12-cr-463-JCM-VCF

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW, AND ORDER**

**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The additional time requested by this Stipulation to Continue Sentencing Hearing is reasonable pursuant to Fed.R.Crim.P. Rule 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed [for sentencing] in this rule.”
2. The parties are requesting additional time to address and potentially resolve their respective objections to their client’s respective presentence investigation reports.
3. Once the PSR Objections have been submitted to parole and probation, the respective PSR authors will need additional time to revise their reports and disclose them to the Court in advance of sentencing.
4. Defense counsel also require additional time to gather information pertinent to sentencing factors under 18 U.S.C. § 3553(a) in order to determine whether a variance may be warranted for their respective clients.
5. Defense counsel for JACQUELINE GENTLE has spoken to her client, who is currently in custody, and she has no objection to the continuance.
6. Defense counsel for DENISE WILLIAMS has spoken to his client, who is not currently in custody, and she has no objection to the continuance.

1 7. Defense counsel for CAROLYN WILLIS-CASEY has spoken to his client, who is  
2 currently in custody, and she has no objection to the continuance.

3 8. The additional time requested herein is not sought for purposes of delay.

4 9. Denial of this request for a continuance would deny counsel for the defendants  
5 sufficient time, to effectively and thoroughly prepare for sentencing. Accordingly, a  
6 denial of this request for continuance could result in a miscarriage of justice.

7 This is the first stipulation to continue filed herein.

8 **CONCLUSION OF LAW**

9 The ends of justice served by granting said continuance outweigh the best interests of  
10 the public in proceeding with the sentencing hearing as scheduled, since the failure to grant  
11 said continuance would be likely to result in a miscarriage of justice, would deny the  
12 defendants sufficient time and the opportunity within which to be able to effectively and  
13 thoroughly prepare for sentencing, taking into account the exercise of due diligence.  
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16 **ORDER**

17 IT IS THEREFORE ORDERED that the sentencing hearing for JACQUELINE  
18 LOUISA GENTLE currently scheduled for April 18, 2016, at the hour of 10:30 a.m. be  
19 vacated and continued to **June 2, 2016 at 10:00 a.m.**  
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21 IT IS FURTHER ORDERED that the sentencing hearing for DENISE WILLIAMS  
22 currently scheduled for April 18, 2016, at the hour of 11:00 a.m. be vacated and continued to  
23 **June 2, 2016 at 11:00 a.m.**  
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3 IT IS FURTHER ORDERED that the sentencing hearing for CAROLYN WILLIS-CASEY  
4 currently scheduled for April 18, 2016, at the hour of 11:30 a.m. be vacated and continued  
5 to **June 2, 2016 at 1:30 p.m.**  
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7 DATED April 1, 2016.  
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UNITED STATES DISTRICT JUDGE  
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